

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF ARKANSAS
HARRISON DIVISION

MICHAEL S. GRIFFIS

PLAINTIFF

v.

Civil No. 05-3040

SHERIFF CHUCK MEDFORD;
LT. BETH REELY; JIMMY
KEELAND; MICHAEL BROWN;
PETE MOSS; JACK GENTRY;
MARK LOTTA; DR. THERESA FARROW;
DR. DONALD CLAY; SHELIA M.
HOWERTON; and REGINA FOX JEFFREY

DEFENDANTS

ORDER

The Carroll County Defendants have filed a motion for summary judgment (Doc. 89). To assist plaintiff in responding to the summary judgment motion, the undersigned is propounding a questionnaire. The court will consider plaintiff's response to the questionnaire in issuing a report and recommendation on the summary judgment motion.

For this reason, Michael S. Griffis is hereby directed to complete, sign, and return the attached response to defendants' summary judgment motion on or before **July 26, 2007**. **Plaintiff's failure to respond within the required period of time may subject this matter to dismissal for failure to comply with a court order.**

IT IS SO ORDERED this 13th day of June 2007.

/s/ J. Marschewski

HON. JAMES R. MARSCHEWSKI
UNITED STATES MAGISTRATE JUDGE

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DEFENDANTS

RESPONSE TO SUMMARY JUDGMENT MOTION

TO: MICHAEL S. GRIFFIS

These questions and answers will serve as your response to the motion for summary judgment filed by the Carroll County Defendants. You may use additional sheets of paper in responding to these questions. You must file this response by **July 26, 2007**.

1. You were booked into the Carroll County Detention Center (CCDC) on January 6, 2003, on six counts of attempted capital murder, arson, criminal mischief, and violation of a protective order.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to the Defendants' Exhibit 1 at page 1.

2. You signed a medical authorization so that the Sheriff's Office could obtain information regarding your physical and mental condition.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to the Defendants' Exhibit 1 at page 5.

3. On a medical history form you indicated you were taking medication for a psychiatric disorder and had recently had a head injury.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 1 at page 7.

4. In October of 2002, you were incarcerated at the CCDC on charges of possession of drug paraphernalia and filing a false report.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to the Defendants' Exhibit 7 at page 11.

5. In 1994, you were incarcerated in the CCDC for obtaining prescription medication by fraud or theft.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

6. You told Jail Administrator Beth Reely that you had been a licensed practical nurse (LPN) and that your license was removed prior to your incarceration in 1994.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to the Defendants' Exhibit 4A at page 11.

7. On November 12, 2002, an order of protection was entered ordering you not to contact or attempt to contact your former wife and children, your victims.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

8(A). On February 17, 2003, you stuck a pencil into your abdomen.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3B at page 2.

(B). You were taken to St. John's emergency room for treatment. You were prescribed an antibiotic and told to change your dressing daily.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3B at pages 2-3.

(C). You received the antibiotic and were able to change your dressing.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain.

9(A). On March 22, 2003, you wrote a multiple page document containing various complaints and suggestions regarding the conditions at the CCDC.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at pages 9-17.

(B). You complained that the cells were filthy and there were gnats, flies, spiders, and mice.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 9.

(C). You complained that it sometimes took days to get request forms.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 9.

(D). You indicated the pre-shower room needed a drain to avoid bacterial growth.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 10.

(E). You indicated the food was very good, served at a decent temperature, the dishes were clean, and the whole kitchen staff worked well.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 10.

(F). You indicated there was only one set of hair clippers which were not cleaned between uses.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 11.

(G). You complained there was no access to law library material.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 11.

(H). You complained there was no medical staff and the jailers had no medical training.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 11.

10(A). On April 21, 2003, you were taken to the Carroll Regional Medical Center for treatment for your hand. You had been involved in an altercation in the jail.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3A at page 55.

(B). Your right hand was x-rayed. No fractures were noted. The hand was wrapped in an ace bandage and you were told to elevate your hand.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3A at page 57 & 59.

11. At 7:55 a.m. on June 12, 2003, you were complaining of chest pain, left arm pain, weak legs, and a headache. Medical personnel were summoned and arrived at 8:20 a.m. Jail personnel were told to observe you. You were moved to an observation cell so that you could be monitored.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 1.

12(A). On June 23, 2003, you stated you were having pain in the side of your head above your right eye. You also stated you were throwing up. You asked to see Dr. Malone, Dr. Nash, or Dr. Carol for an emergency visit.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 10.

(B). On June 24th, you submitted a grievance stating that you had a migraine the previous day and had been having them for fourteen years. You indicated that you knew how to treat them. You stated your Mother had offered to pay for the visit and any medications.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 11.

(C). Did you receive any treatment in response to this request or grievance?

Answer: Yes _____ No _____.

If you answered yes, please state: (a) who you received treatment from; (b) what treatment you received; and (c) when you received treatment.

(D). On June 25th, a notation was made that Officer McGee spoke with you and told you to have your Mother make an appointment and tell them when it was. Did you do this?

Answer: Yes _____ No _____.

If you answered no, please state why not.

13(A). On July 1, 2003, you submitted a medical request stating that you were having recurring migraines, nausea and vomiting. You stated you would like to see a doctor today.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 14.

(B). McGee was asked to check it out and see if you were eating, watching television etc. In response, he said you were acting just fine and your problems might be due to your teeth which were going to be pulled the following day.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 14.

14(A). On July 2, 2003, you submitted another medical request. You stated that you were having drastic migraine headaches. You indicated you were having nausea and vomiting and were at times unable to move. You stated you did not understand why they refused to let your Mother pay for your visit and medicines after you were told to go ahead and make the appointment.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 15.

(B). In response, you were told a headache was not an emergency. You were also told you had a dental appointment that day and your headache might be due to that.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 15.

15(A). On July 3, 2003, you submitted a medical request. You stated you had suffered from migraines for eleven years and they were making a comeback. You indicated Dr. Malone had you on some medicine that helped. You stated your headaches were getting worse. You stated your Mother would pay.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 16.

(B). In response, you were told to have an appointment made, let them know, and you would be transported to the appointment.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 16.

(C). Did you get an appointment?

Answer: Yes _____ No _____.

If you answered yes, please state: (a) who treated you; (b) what treatment you received; and (c) when.

If you answered no, please state why you did not get an appointment.

16(A). On July 9, 2003, you submitted another request asking for an appointment because of your migraine headaches.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 17.

(B). In response, you were asked if the appointment your Mother made was off and you wanted them to make the appointment. Then another notation was made that an appointment was made for July 28th at the Ozark Guidance Center (OGC).

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 17.

17(A). On July 9, 2003, you requested an appointment be made with your psychiatrist so you could talk to him about your medications. You stated you were out of some

medication and believed some needed to be changed.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 19.

(B). An appointment was made for July 28th.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 19.

18(A). On July 10, 2003, you submitted a grievance stating you had been out of Lexapro for six to eight weeks and were now out of Klonopin. You indicated you explained to Officer McGee that you switched between Valium and Klonopin. You indicated you were getting nervous and jittery.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at

page 20.

(B). Please explain what condition or conditions the Lexapro, Klonopin, and Valium were for, who had prescribed these medications, and how long you had been taking these medications.

Answer:

(C). What response did you receive to your grievance?

Answer:

19(A). On July 15, 2003, you submitted a medical request stating that you needed to talk to the doctor about changing your medications. You stated you were supposed to go once a month to see the doctor and once a week to see the therapist and had done neither.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 21.

(B). In response, you were told Dr. Clay was on vacation and was not available until later in August. You were told an appointment had been made for you later in the month at the earliest possible time according to OGC.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 21.

20(A). On July 30, 2003, at 6:15 a.m. your prescription of Clonazepam ran out but Ozark Guidance Center (OGC) had said a prescription of Valium would be called in and you should take it in its place. Attempts were made to verify this with OGC.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at

page 2.

(B). At 10:40 a.m. the Valium prescription was filled and delivered to the jail. You were given the Valium with your noon medication.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 2.

(C). You complained that you should have received 10 mg. dosage of Valium not 5 mg.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 3.

(D). OGC was contacted and advised CCDC personnel that the dosage had been changed to 5 mg. on purpose.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 3.

21. In August of 2003 and early January of 2004, you were the only inmate at the CCDC taking Seroquel.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to the Defendants' Exhibit 7 at page 11.

22. On August 28, 2003, a Seroquel table was found hidden in another inmate's cell after you had gone to recreation with the inmate. Thomas Householder said you gave him the pill to help him sleep.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11 and Defendants' Exhibit 2A at pages 5-7.

23(A). On October 3, 2003, you submitted a medical request stating that your left knee was swollen and very painful. You stated that it looked like you had been bitten by a spider. You indicated it hurt to stand or walk.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 23.

(B). Your knee was examined and it was observed to be swollen with two hole like indentations. You were given a bag of ice and monitored.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 23.

24(A). On October 22, 2003, you submitted a medical request asking for treatment for a herniated disc. You stated that it had been established through MRI's and CT scans. You indicated you were in a great deal of discomfort and wanted to speak to the doctor about trigger point injections and being put back on Ultram.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 25.

(B). An appointment was made for you with Dr. Malone on October 29, 2003.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 25.

25(A). On November 17, 2003, you and Raymond Mock complained to Jailer Brown that you had insect bites. Brown reported to Sgt. Reely that the bites looked like they needed medical attention.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 27.

(B). Reely called Lake Harrison Clinic and asked for emergency appointments. Reely was told they would work both of the inmates in. You were taken to the clinic, examined by the doctor, and given a prescription that was filled the same day.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 27.

(C). Reely requested Terminex to come in and spray for spiders and other insects that

week.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 27.

(D). She also requested that Terminex be allowed to come and spray the jail on a monthly basis to prevent further discomfort to the inmates and the expense of doctor's visits and prescriptions.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 27.

26(A). On December 1, 2003, you requested an appointment with Dr. Malone because of your degenerative joint disease and herniated disc.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at

page 28.

(B). An appointment was made for you on December 3rd.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 28.

27(A). On December 16, 2003, you were taken to the emergency room at St. John's for treatment for facial lacerations following an altercation.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3B at page 8.

(B). You had a laceration that requires staples and they were to be taken out in five days.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3B at page 10.

28(A). On December 17, 2003, you were involved in an altercation with Jim L. McDonald.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at pages 8-9.

(B). You told Officer Ralph Gordon that McDonald had started hitting and kneeing you for no reason. You were bleeding from the face area. A Polaroid picture was taken of your injuries and emergency medical personnel from St. John's were summoned.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 9.

(C). McDonald reported that you walked up to him during recreation and hit him on the left side of his face with a closed right fist. McDonald claimed he merely defended himself by striking you and then taking you to the ground.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 9.

(D). McDonald had abrasions on his neck and jaw and a contusion just below his left eye. There was blood on his pants bottom, left leg. McDonald denied he needed medical attention.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 9.

(E). Brandon Webb told Gordon that you had walked up to McDonald got face to face with him and struck McDonald in the face. Webb said McDonald struck you back and held you down until Jailer Brown arrived. Brandon Webb also provided a written statement.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at pages 10 & 12.

(F). Corey Howerton stated that you called McDonald a snitch, hit McDonald in the face, and then McDonald hit you back. McDonald then threw you to the ground and held you down until Jailer Brown arrived. Howerton also provided a written statement.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at pages 10 & 14.

(G). You were transported to St. John's Hospital by ambulance with a list of your medications.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at pages 10 & 18.

(H). David Harp provided a written statement about the incident.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at pages 15 & 16.

(I). On December 17, 2003, it was decided that criminal charges would not be filed against you as a result of this incident.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 22.

29. On December 29, 2003, a prescription was written to resume your Paxil CR 12.5 mg. and Seroquel.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 32.

30. On January 2, 2004, Sgt. Reely informed Dr. Farrow that you had been trading your medications on the black market. In response, Dr. Farrow requested that four of your medications, Lexapro, Paxil CR, Seroquel, and Trazodone, be discontinued and that you be tapered off another medication, Diazepam.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to the Defendants' Exhibit 4A at page 33.

31(A). On January 3, 2004, an inmate, Eric Etchison, gave Jailer Brown a pill that he claimed came from you.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11 and Defendants' Exhibit 2A at page 27.

(B). The pill was later identified as Seroquel and you were the only inmate in J-Block who took Seroquel. You and Eric Etchison went to recreation together.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 27.

32. Reely reported these findings to the doctors who were prescribing the medications including the OGC.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

33(A). On January 12, 2004, you requested copies of the letter from the doctor who ordered four of your medications discontinued. You stated you wanted to show the copy of the letter to the court. You also stated that your sink broke and you did not have access to fresh water.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 35.

(B). In response, you were told that your attorney had been faxed a copy of doctor's letter after your visit with the attorney on Friday. You were also told the faucet in the sink

worked fine and you could obtain water out of it. It was just the fountain that did not work.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 35.

34. On January 13, 2004, you submitted a request for medical treatment for excruciating back pain and a migraine. You asked to be taken to Dr. Malone. An appointment was made that day for 4:15.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 36.

35(A). On January 15, 2004, Jailer Keeland brought you to the booking desk for your medication. You were given your Oxycodone and you stated you wanted some Tylenol too. Keeland asked where your Oxycodone tablet was and you stated you had taken it. Keeland didn't believe you because it looked like you were hiding something.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 28.

(B). Keeland checked your hands and found what was determined to be Raymond Mock's Chlorpromazine 25 mg. tablet. Mock was your cellmate. You refused to say how you had gotten the pill.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 28.

36. On January 15, 2004, Mock wrote a statement in which he stated he took his two pills when they were brought. He indicated that he was told you had one of his pills in your pocket. Mock stated he may have dropped one of his pills after morning or evening medication on the floor without realizing it because he was half asleep.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 29.

37(A). On January 15, 2004, Keeland brought you to booking to take your medication. You were asked to drink the water you were given while taking your medication. You refused to drink the water.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 30.

(B). Did you take your medication without water?

Answer : Yes _____ No _____.

If you answered yes, please explain why you refused to drink the water.

If you answered no, please explain why you refused to take your medication.

(C). Sgt. McGee asked you to drink your water to the best of your ability while you took your medication. McGee asked you two more times. You refused.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2A at page 31.

38(A). On February 2, 2004, you submitted a request for dental care saying you had a large hole in your tooth causing you a great deal of pain.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 42.

(B). A dental appointment was made for you for the following day.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 42.

39(A). On February 18, 2004, you submitted a medical request stating you had a foul smelling rectal discharge and had been experiencing loose stools for fourteen or fifteen days.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 44.

(B). An appointment was scheduled for you to see the doctor the following day.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at

page 44.

(C). Were you seen the following day?

Answer: Yes _____ No _____.

If you answered yes, please state: (a) who you saw; and (b) what treatment you received.

(D). You were seen by Dr. Malone on February 25, 2004.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5D at page 10.

(E). On February 26, 2004, Dr. Malone advised the Sheriff's Office to discontinue

your Internal.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4D at page 10.

40(A). On March 13, 2004, you had a cardiovascular stress test at St. John's Hospital. Dr. Malone had ordered the test.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3A at page 64.

(B). You had a negative treadmill stress test. Your pain was determined to be not cardiac in nature.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3A at page 64.

41(A). On March 14, 2004, you submitted a medical request stating that you were to have a follow-up visit with Dr. Castillo according to Dr. Horton. You stated you were still having severe chest pains every day.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 45.

(B). Reely responded that she had spoken with Dr. Horton's office and was told your stress test had showed everything was fine and that future appointments should be with your family doctor, Dr. Malone. You were asked if you wanted an appointment scheduled with Dr. Malone.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 45.

(C). You responded that Dr. Malone is not and never had been your family doctor. You stated Dr. Steusby was your doctor for many years. You indicated you didn't want there to be any mis-communication but you didn't care who you saw you just wanted your chest to quit hurting.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 47.

(D). Reely responded that Dr. Horton's office said it was Dr. Malone. Furthermore, she noted that you had previously requested Dr. Malone when there had been a meeting in the office with the Sheriff, your attorney, and you.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 47.

42(A). On March 30, 2004, you submitted a medical request asking about your appointment for chest pain. You stated you were still having severe chest pain and some routine discomfort.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 48.

(B). In response, you were told your appointment had been scheduled and it was that day.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 48.

43(A). On April 26th you submitted a request stating that you ran out of Ultracet for

chest wall pain on the 22nd and it still had not been re-filled.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 49.

(B). In response, you were told your prescriptions had been re-ordered and should be there today. You were told you would receive them as soon as the jail got them.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 49.

44(A). On May 6, 2004, you requested medical care for your ear.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 50.

(B). An appointment was made for you to see the doctor the following day.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 50.

(C). You were treated by the doctor on May 7th.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 59.

45(A). On May 23, 2004, you indicated your ear infection was back and you had just finished a round of antibiotic. You stated you thought you were getting a sinus infection too.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 51.

(B). Reely contacted Shelia Howerton who called in a prescription for you.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 51.

46(A). On May 30th or May 31st, you submitted a medical request stating that you were very sick. You indicated your throat was swollen and both ears were very painful. You also stated that routine showers should not be taken away when there was so much sickness in the jail.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 53.

(B). In response, you were told you missed your shower because you were locked down due to contraband being found in your cell and one of your pills had been found with another inmate. You were also told another appointment had been made about your ear problem.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 53.

(C). You were treated by the doctor on 6/1/04.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 58.

47(A). On June 7th, you submitted a medical request saying that your ears were still painful. In response, you were monitored.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 54.

(B). You were still on medication at this point for the infection.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain.

48(A). On June 16, 2004, your attorney wrote Sheriff Medford and indicated you were still having difficulties with your ears and needed to get some medication to clear up the problem. He also indicated you still had many cavities and needed those repaired.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 62.

(B). On June 17, 2004, you submitted a medical request stating that you were having breathing difficulties that made you panic at times.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 55.

(C). Reely talked to you and you indicated the problem might be stress related.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 55.

(D). A doctor's appointment was made for you for June 21st with Dr. Malone and a

list of your current medications was sent to him.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 55 and 61.

49(A). On July 9th you submitted a request stating you had a bad tooth problem and indicating you would like to see a dentist.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 63.

(B). In response, you were told an appointment would be made.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 63.

50(A). On July 28th you submitted a request which stated you had an appointment to see Dr. Spulin and he had given you fourteen days of antibiotics. You indicated you needed orajel. You stated your teeth were in bad shape and you needed something done. You asked why you didn't get to go to the dentist. You stated you were taking the equivalent of two aspirins four times a day but it was not very effective.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 65.

(B). In response you were told the dentist said yesterday you needed a cleaning for your mouth pain and an appointment would be made. You were told that they did not provide orajel. You were also told that you could not take Ibuprofen.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 65.

(C). Why couldn't you take Ibuprofen?

Answer:

51. On August 6th your attorney wrote Sheriff Medford. Vowell noted that you had seen Dr. Spurlin on July 14th and were given a two week prescription to clear up gum infection and then were to return on July 27th. However, you were not taken to your July 27th appointment. Vowell asked that you get continuing dental treatment.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 67.

52. On August 6, 2004, you submitted a request stating that your right foot bones were painful to the touch and you left leg where the bones had been exposed hurt. You said

the aspirin and Tylenol didn't combat the pain well. You stated this was not a request to see the doctor and was simply meant to keep them and your attorney informed of the ongoing situation.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 68.

53(A). On August 14th you requested cleaning supplies. In response, you were told you could have cleaning supplies any time during day shift, Monday through Friday.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 69.

(B). Were inmates responsible for cleaning their own cells?

Answer: Yes _____ No _____.

If you answered yes, please state what cleaning supplies were available and how you

obtained the cleaning supplies.

If you answered no, please explain how the cells were cleaned.

(C). Who was responsible for cleaning common areas of the jail such as day rooms, etc.?

Answer:

54. On August 10, 2004, Sheriff Medford replied to Vowell's letter. He indicated that on July 27th, Dr. Spulin's office advised that you needed a teeth/gum cleaning procedure and the first available appointment was scheduled with the hygienist and that was for August 19th. Vowell was advised that you were provided toothpaste daily, a toothbrush to keep in your cell, and during the antibiotic treatment you were offered hydrogen peroxide. Sheriff Medford also advised Vowell that you made a suicide attempt that morning and were on suicide watch.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 70.

55(A). On August 10, 2004, you were treated at the emergency room at St. John's

Hospital in Berryville. Sutures were applied. You were to wash the wound daily with soap and water, apply neosporin ointment and gauze dressing. You were prescribed an antibiotic and given a tetanus shot. The sutures were to be removed on August 24th.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3A at page 2 and 3E at page 14.

(B). Where was your injury?

Answer:

56(A). You were taken to the emergency room at St. John's again on August 22, 2004, to have your legs checked. You were told to keep your legs elevated as much as possible. You were to keep your wound clean and dry and cover it with silvadene daily.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 72.

(B). You were taken to the emergency room again on August 27th.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3C at page 55 and 3D at page 1.

(C). You were instructed to take care of your wound or you would lose your leg.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3C at page 55.

(D). A wound care kit was provided for day jailers containing hibiclens, gauze pads, irrigation rinse, prescription SSD 1% cream, gauze bandage, and a garbage bag. Jailers were

to watch you while you treated the wound and make sure they got all supplies back. You were to sign the sheet in the care kit for the products.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3C at page 55.

(E). If you refused to treat the wound, it was to be noted on the log.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3C at page 55.

57(A). On August 28th, you submitted a complaint that a deputy had tried to give you the wrong medication. You indicated this was the fourth time this had happened although you had caught it each time. You also said your Valium and Paxil prescriptions were short. Finally, you said you were not getting the right supplies for your leg.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 71.

(B). In response, you were told that your medications had been checked and were all accounted for.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 71.

58. On August 30, 2004, you were treated at St. John's. You were told to apply dressings wet to dry twice a day and take Tylenol for pain.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3E at page 9.

59(A). On September 9, 2004, you stated your left leg was very swollen and had a nasty discharge. You stated you were supposed to see Ms. Howerton or Dr. Burke and asked if the appointment could be expedited.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 75.

(B). In response, you were told that since you and your attorney had complained that Howerton was not a real doctor that an appointment had been made for you with Dr. Malone.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 75.

60(A). On September 22, 2004, you requested a screening by a mental health care

worker. You also asked that your appointment be rescheduled with Shelia Howerton. You stated she was attempting to regulate you antidepressant.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 76.

(B). In response, you were told to discuss your request for a mental health examination with your attorney and they would take you when they received a court order. As to your request for an appointment with Howerton, you were told that both you and your attorney had said Howerton was not a real doctor after you had been taken to see her and that all future appointments would be made with a "real doctor."

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 76.

61(A). On September 24, 2004, you complained that you had to wait several hours

for a dressing change.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 77.

(B). In response you were told the doctor's instructions were that you were to be allowed to change the dressing on your leg once a day. Depending on the officers' schedule, the time of the change might vary.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 77.

62(A). On September 27th you submitted a request (erroneously dated August 27th) that stated you had an appointment with Shelia Howerton and she was trying to get you back on a proper anti-depressant regimen. You stated that your appointment was canceled because you said she was not a real doctor. You pointed out she was not a doctor but an advanced

nurse practitioner. You asked to see Howerton or Dr. Burke the jail doctor.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 79.

(B). You were told you were not being refused a doctor. You were not being taken to Howerton because you and your attorney had complained she was not a real doctor. You were told there was no jail doctor. You were told that your appointments would be with Dr. Malone. With respect to your mental health treatment, you were told to contact your attorney.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 79.

63(A). On September 27 you submitted a grievance stating you asked for a bio-hazard bag to disposed of your old dressing from your leg. Once you showered you stated

you waited all day for the new dressing.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 80.

(B). In response, you were told they did not have bio-hazard bags and they hospital did not provide them. You were also told that the staff tried to meet your personal needs.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 80.

64. On September 28, 2004, you were seen at St. John's emergency room regarding the wound on your left lower leg. You were instructed to continue your wound care.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 16 & 17.

65(A). On September 29, 2004, you submitted a grievance stating that in late August or early September you had a fall in the upper recreation room. You indicated Michael Brown accused you on being doped up and of wanting to go to the hospital to get dope. You indicated you fell because you were dizzy and your leg was asleep. When EMS arrived at the jail and asked if you wanted to go to the hospital you said you were fine. You asked if the staff was so poorly trained they could not take basic vital signs.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 81.

(B). In response you were told explanations would be provided to your attorney and in court when your lawsuit was filed.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 81.

66(A). On September 29, 2004, you stated that day shift was supposed to change your dressing. You indicated it was the jail's responsibility to get bio-hazard bags. You indicated that people at the jail were subject to coming into contact with your bodily fluids because of the way your dressings were mishandled. You indicated a 10% bleach solution had been requested for the shower after you bathed but was not provided. You also said your dressing had been changed in the food preparation area.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 82.

(B). In response, your grievance was noted and you were told an explanation would be provided by the defendants' attorney when your lawsuit was filed.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4A at page 82.

67(A). On October 10, 2004, you submitted a grievance stating you had been talked to by Pete Moss about your having written a grievance on him for ignoring your request that he assess your leg injury. You indicated you did not need a dressing change but instead were bleeding and needed medical attention.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 3.

(B). On October 11, 2004, Moss wrote a response stating that he had been told on October 5th by inmate Hill that you wanted your dressing changed. He advised Hill to tell you that it was day shift's responsibility. Moss talked to you later but about other matters.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 4.

68(A). On October 11, 2004, you submitted a medical request stating that you had a spider bite.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 6.

(B). In response, you were taken to the emergency room and had the bite looked at and your left evaluated again.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 6.

(C). Was the CCDC treated or sprayed for insects to your knowledge?

Answer:

69. Between October 28th and October 31st, 2004, you wrote a number of grievances about Reely calling Dr. Farrow at OGC and claiming to have seen no difference in you when you took your various prescription medications.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at pages 8 to 15.

70(A). On October 30, 2004, you submitted a grievance stating that on or about December 16, 2003, you were taken to St. Johns to have five sutures in your lip following a fall. You indicate you were to go back in five days to have the sutures removed but were not taken back and had to chew them off.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 21.

(B). Please explain why you waited more than ten months to ask why you were not taken back to the doctor for suture removal in December of 2003.

Answer:

71. On October 31, 2004, you complained of Pete Moss almost choking your air off in the restraint chair and of being ignored for six hours. You also stated that Jimmy Keeland left you unattended for five hours. Please state: (a) the date you were in the restraint chair; (b) how long you were in the restraint chair; (c) the reason you were in the restraint chair; (d) whether you were given breaks from the restraint chair to stretch your legs, use the restroom, etc.; and (e) if you were in the restraint chair on October 31st please explain how you were able to write the grievance.

Answer:

72(A). On November 3, 2004, you submitted a medical request complaining of severe pain in your leg. You also complained of spasms in your spine.

Agree_____Disagree_____Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 31.

(B). In response, you were told you had been treated at the emergency room but would be taken there again. You were taken to the emergency room and treated.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 31-32.

73. On November 3, 2004, you submitted a grievance about your dressing being changed on October 22nd, 23rd, and 24th in a food preparation area. How do you believe this violated your federal constitutional rights?

Answer:

74. On November 16, 2004, you submitted a grievance stating you had not been

allowed to care for your leg for two days and had to re-use the old gauze one day.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 31-32.

75(A). On November 24, 2004, you submitted a medical request stating you were having severe anxiety attacks and asking to see Shelia Howerton or Dr. Birk.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 44.

(B). In response, an appointment was made for you to see Shelia Howerton.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 44.

76(A). On November 29, 2004, you submitted a request stating the medication Shelia Howerton placed you on, Bextra, had been pulled from the market because it had been found to cause heart problems. You asked that your letter to her be faxed so that something could be done about the medicine situation.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 48.

(B). Your letter was faxed to her the following day.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 48.

(C). Howerton replied that Bextra had not been taken off the market.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 50.

(D). On December 15, 2004, Howerton stated that if you felt uncomfortable taking NSAIDs then she agreed you should quit taking Bextra. However, she stated she would not replace it with narcotic pain medication. She indicated you could take your Ultram.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 41.

(E). Howerton noted you also repeatedly asked for Xanax and Soma. She noted that Valium functioned as both an anti-anxiety medication and a muscle relaxer.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at

page 41.

(F). With respect to your Seroquel and Paxil, Howerton stated she had repeatedly told you that she would increase it slowly. If that was not satisfactory with you, she suggested that you consider an alternative health care provider.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 41.

77(A). On December 19, 2004, you submitted a grievance stating that you and inmate Dale Vida Smith had been moved from J block to M block by Officer George Jeffries. You indicate the cell you were placed in the back wall faced north and was so wet the anything touching it immediately became wet. You indicated your writing paper, pictures, and letters were warping from the moisture. You also said there was mold growing from the ceiling to the floor.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at pages 56-57.

(B). You indicated there was not enough light in the cell to read a book, the sink did not work unless you jammed a tooth brush inside it. The toilet did not flush unless you flushed it twenty or thirty times for five seconds at a time. You also indicated the cell was so cold two or three blankets failed to keep you warm.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 56.

(C). On December 18th, you indicate you were denied your hour of recreation, a shower and clean clothes.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 57.

(D). Please describe in detail the M block cell you were confined in. In doing so, state the size, the number of bunks, whether it had a table, sink, shower, etc.

Answer:

(E). Please provide the dates you were confined to the cell in M block.

Answer:

78. On December 20, 2004, your attorney sent Sheriff Medford a four page grievance you had prepared and indicated he would like to hear Sheriff Medford's side of the story about you and Vida Smith being placed into a wet cell.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 60.

79. On December 20, 2004, you submitted a grievance complaining that you were brought insufficient medical supplies for your wound. You stated there was no hibiclens and no triple antibiotic cream.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at

page 61.

80(A). You were placed on lock-down from December 17th until December 20th because you refused to move into your newly assigned cell because the wall was damp.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 64.

(B). On December 20th you were taken off lock-down but warned that further refusal to obey a jailer's orders would result in further lock-down. You were offered recreation at that time. You refused but Smith went to recreation.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 64.

(C). On December 21, 2004, you were moved to an interior cell that did not have a moisture problem.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 64.

81(A). On December 21, 2004, Shelia Howerton faxed you a letter stating that Valium worked as a muscle relaxer. She indicated she would not prescribe you both Valium and Soma.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 30.

(B). She indicated that she did not need you to fax her information regarding the side

effects of medications. If you were frustrated with her, she stated you were free to choose another healthcare provider in the area.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 30.

(C). She stated she would not allow you to dictate to her what medications she would prescribe to you. In her opinion, it would not be safe for her to prescribe the medications you were seeking.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 30.

82(A). On January 10, 2005, you submitted a medical request complaining of chest wall pain. You stated it hurt to breathe.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 68.

(B). Your medical request was faxed to Shelia Howerton.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 68.

83(A). On January 13, 2005, you stated you were in great discomfort and indicated in the past you had always been given Soma a muscle relaxer.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 69.

(B). Your request was faxed to Shelia Howerton.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 69.

(C). Howerton asked if you could stay off your Valium while you took Soma. If so, she said she would call you in some.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 70.

(D). You replied that you had taken Valium for years and could not just quit. You asked that she could ahead and make an appointment with the doctor.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at

page 70.

84(A). On January 19, 2005, you asked if you could take recreation upstairs or move back to J block. You indicated you were extremely nervous and scared "down there." You indicated you were on medication for anxiety disorder, panic disorder, and clinical depression.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 72.

(B). In response, you were told you could not take recreation with J block. You were told you could take recreation with the other inmates or stay in your cell. You were told you were on medication for your mental problems and if the medications were not working perhaps you needed to discuss that with your doctor.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at

page 72.

85(A). On February 3, 2005, Howerton noted that she had received a refill request for your Seroquel. She stated that she had called and checked to see if they needed to increase your dosage. She was told that it was fine where it was at. She increased your dosage to 175 mg. three times a day.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 42.

(B). With respect to the Paxil CR, Howerton noted that you were on 625 mg., per day and that was the maximum recommended daily dosage. For that reason, she would not increase it.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 42.

(C). Finally, with respect to your leg, she stated she could not do anything without seeing it. She stated if you needed to be seen to request an appointment.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 42.

86(A). On March 8, 2005, you submitted a medical request. You indicated you were having pain in your whole spine. You asked to see an ortho doctor.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 77.

(B). Your request was faxed to Shelia Howerton.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4B at page 77.

(C). On March 8, 2005, Sheila Howerton suggested that you seen an orthopedist ASAP. She was not sure why you were having to beg to see an orthopedic MD she did not know if it was because of the MD's office or a problem with the facility.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 1.

(D). Was it a problem with the MD's office or the CCDC?

Answer:

87(A). On March 8, 2005, Dr. Ricciardi, of the Orthopaedic & Sports Medicine Clinic of Northwest Arkansas, wrote to you via your attorney to advise you that he would not be writing any additional medications besides the Soma prescribed on January 18th and filled at Poynor Drug. He did authorize the dispensing of a new prescription for 100 carisprodol 350 mg. tablets to be taken one four times a day as needed with the last dose to be taken at bedtime with one refill allowed. He was not authorizing any more pain medication.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 31.

(B). Dr. Ricciardi noted that the rib series and frontal chest film was unremarkable with no evidence of fracture, dislocation, or subluxation of the ribs.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 31.

88(A). On March 9, 2005, you again asked for an appointment with an orthopaedic doctor. You also asked for a refill of your carisprodol. You said you had been out for two days.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 8.

(B). In response, you were told the doctor had to okay a refill of the medication and the doctor had not yet okayed the refill. As soon as the doctor authorized it, you were told it would be obtained. You were also told an appointment was made with Dr. Riccardi.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 8.

89(A). On March 10, 2005, Howerton wrote that she did not do trigger point injections but noted that she understood you had gotten another appointment with Dr. Riccardi.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 4.

(B). What treatment did you receive from Dr. Riccardi?

Answer:

90(A). On April 7, 2005, Shelia Howerton wrote that she did not feel comfortable with so many medications with similar effects. She indicated she wanted another doctor to see you and attempt to discover a physical reason for your pain as she did not feel comfortable treating pain without an etiology she could document.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page

32.

(B). She indicated she did not get any new recommendations from the psych evaluation.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 32.

(C). At this point, she felt with your many medications you needed to find another primary care provider. She stated that she felt a physician might be better able to respond to your emotional treatment as well as your pain management.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 32.

(D). She stated she would provide emergency treatment for the next thirty days to allow you to find alternate healthcare.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 32.

91(A). On April 28, 2005, you submitted a medical request about pain in your lower right tooth.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 19.

(B). In response, you were told the dentist would not be there until Monday and a call would be made then.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 19.

92(A). On May 1, 2005, you submitted a request about your tooth and gum lines asking whether they had remembered to call the dentist.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 20.

(B). You were told a call had been made.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 20.

93. On May 24, 2005, Reely wrote you regarding your medication refills. She stated she had received a call from Jim at Poyner Drug and was told by him that Shelia Howerton would no longer refill your medication and that she was no longer treating you and had informed you of that fact. Reely told Jim that you had been treated by Dr. Malone. Dr. Malone was contacted but refused to refill the medication. You were asked if there was another doctor in Carroll County they could call for you.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 21.

94. You asked for Dr. Stensby's number but were told he was no longer in the phone book and was believed to have moved to Benton County.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 22.

95(A). You were seen at the Rural Health Clinic on June 17, 2005. You had pain and edema below the ankle on your left leg. You also complained of some discomfort in your chest and some shortness of breath.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3E at page 4.

(B). You were prescribed medication and told to elevate your leg.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3E at page 4.

96(A). On July 4, 2005, you submitted a request stating you needed a glucometer and a blood pressure cuff that worked.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 33.

(B). Please explain why you needed a glucometer.

Answer:

(C). Please explain what was wrong with the blood pressure cuff that was available for your use.

Answer:

(D). Did you take medication for high blood pressure?

Answer: Yes _____ No _____.

If you answered yes, please state what medication you took, who prescribed it, and when you began taking it.

(E). Did your doctor require you to keep track of your blood pressure?

Answer:

97(A). On July 20, 2005, you submitted a medical request asking to be taken to the doctor about your leg. You indicated you believed it was infected again.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 46.

(B). In response Lott and Brown were asked to look at your leg and report back.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 46.

(C). You were taken to the emergency room about your leg.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain.

98(A). On July 22, 2005, you asked to be taken to Dr. Justice again.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 51.

(B). In response, you were told your attorney would need to obtain another order to allow you to go to see Dr. Justice in Jasper.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 51.

99(A). On July 28, 2005, you submitted a request stating that you had a signed court order to see your own doctor and he wanted to see you in a couple of weeks. You stated they were taking you to the hospital in Berryville instead of to Dr. Justice.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 55.

(B). Reely pointed out the order only covered the June 17th visit to Dr. Justice. She told you that you would have to get another court order for subsequent visits. With respect to the emergency room visit in Berryville, Reely noted that was for treatment of your leg

infection.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 55.

100(A). On July 13, 2005, you submitted a medical request stating that you had bone fragments moving in your lower right jaw causing you discomfort.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 62.

(B). In response, a dental appointment was made.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 62.

101. On August 29, 2005, you were seen at the Rural Health Clinic for problems about your left leg and a migraine headache.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3E at page 5.

102(A). On August 31, 2005, you submitted a medical request stating that Dr. Justice indicated you needed to see the dentist and that your problems with your teeth might be causing your headaches.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 64.

(B). In response, you were told that Dr. Justice needed to tell the CCDC that is he wanted you to see the dentist.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 64.

103(A). On September 1, 2005, you submitted a grievance asking how you could brush your teeth without tooth paste. You also stated that Dr. Justice was not seeking a dental appointment. You pointed out you were in their custody and it was their responsibility to see to their welfare.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 66.

(B). You submitted a second request that same day in which you stated Dr. Justice did tell them about your teeth but through you. You requested a dental appointment. You

stated that you could not brush more than once a day, lacked proper nutrition, and had no sunlight for 2 ½ years. You indicated the toothbrush and tube of crest the dentist had given you had disappeared.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 67.

(C). In response, you were told you could brush your teeth as often as you would like. You were told you were provided a toothbrush and tooth paste. You were also told that you had been to the dentist on July 14th and had been seen by the dentist eight times since January of 2003. Moreover, you were told Dr. Justice had provided no instructions to Reely or through your attorney to Reely.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 67.

(D). You had been seen by the dentist eight times between January of 2003 and September 1 of 2005.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain.

(E). You had a toothbrush and tooth paste available for your use.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain.

104(A). On September 8, 2005, you asked if Dr. Justice could be called and asked to prescribe Phenergan suppositories. You stated you had been vomiting all night.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 69.

(B). Gentry reported that you ate lunch and were out of your cell and not vomiting.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 69.

105(A). On September 12, 2005, you requested that an appointment be made with a dentist. You stated your back tooth was black.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 71.

(B). An appointment was made for the following day.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at

page 71.

106(A). On September 14, 2005, you submitted a grievance. You stated you had been complaining of a migraine since before the move from the old jail. You stated you asked for a quieter cell. You indicated you asked for your medicine for your headaches and were refused.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 72.

(B). What day was the move made from the old jail to the new jail?

Answer:

(C). In response, you were asked what medication was not given you. You were also told you had been to the doctor since the move had been made to the new jail and you had been receiving all prescribed medication.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 72.

(D). What prescribed medication did you not receive? In answering, also indicate who prescribed the medication and when.

Answer:

(E). You then asked for the two sheets of papers the doctor sent back to the jail. You were given copies and told there were no notes on the sheets for the jail to follow.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 74.

(F). What sheets are you referring to?

Answer:

(G). On September 16, 2005, you submitted another request stating you still had the headache. You asked if one of the Harrison Clinic doctors would see you, or Dr. Lee, or the emergency clinic. If not, you stated you would have to call Steve.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 75.

(H). In response, you were told that Reely could not arrange new doctors. She told you that both she and your Mother had called all the doctors in the county. She asked if you

wanted her to call Dr. Justice. She also asked if you told Steve you needed to go back to the doctor so he could get the order.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 75.

(I). Is the Steve you are referring to your attorney Steve Vowell?

Answer: Yes _____ No _____.

If you answered no, please explain who Steve is.

(J). On September 16th Dr. Justice authorized a refill of your migraine medicine but not of the suppositories.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 76.

107. On September 18, 2005, you were seen at the emergency room at St. John's.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3E at page 27.

108(A). On September 21, 2005, you submitted a request for medical attention because of edema in both of your feet.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 79.

(B). In response, you were taken to the emergency room for evaluation.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 79, Exhibit 4B at 66, Exhibit 3E at page 6.

(C). You were to return the following day for venus doppler studies. Your tramadol was to be stopped.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3E at page 6.

(D). Did you have the study done?

Answer:

109. On September 22, 2005, central control was told to leave your cell door open

because you needed to be able elevate your legs and still be able to hear the television during the day.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 3D at page 38.

110(A). On September 23, 2005, you stated that one of your medications Butal was in an envelop marked: "A pod Griffis only if he asks for it (Don't ask him if he wants it)." You stated it would be hard to ask for something if you didn't know you had it. You stated you had not been given a copy of the doctor's orders although you had repeatedly asked for them at the old jail.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 80.

(B). In response, you were told that since you had discussed your problems with your

doctor in Jasper who had prescribed the medication and you were an LPN, they assumed you knew about the drug and its instructions. Additionally, it was noted you were provided a copy of the doctor's orders on September 14th after you requested them.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 80.

111. On October 13, 2005, you were told that due to your history of self mutilation you would be held in the observation room until you were transferred to the Arkansas Department of Correction (ADC). You were told this was for your own safety.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4C at page 83.

112(A). During your incarceration at the CCDC, you mutilated yourself with sharp objects on two occasions.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

(B). On February 18, 2003, you stabbed yourself in the stomach with a pencil.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

(C). On August 10, 2004, you cut your leg. You cut it with a blade from a razor.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer Defendants' Exhibit 7 at page 11 and Defendants' Exhibit 2A at page 36.

(D). Both injuries required you to be taken to the emergency room for treatment.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain.

(E). After these injuries, you were placed on suicide watch temporarily.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11 and Defendants' Exhibit 2A at page 59 and Exhibit 2B at pages 1-11.

(F). Following the cut on your leg, you purposefully did not follow doctor's orders and tore the bandage off that had been applied at the hospital, refused to elevate your leg, and tried to remove the stitches.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11 and Defendants' Exhibit 2B at page 15.

(G). After you were transported from the hospital, as officers left the room where you were housed, you told Officer Keeland: "Thank you for taking off my bandage." However, the bandage was still on you when the officers left the room.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 15.

(H). You removed the bandage yourself almost immediately after the officers left the room.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 15.

(I). You complained to your attorney, Steven Vowell, that you were not being cared from properly.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain.

(J). Vowell was shown the video tape of you removing the bandages that jail staff had provided according to the doctor's orders.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

(K). Your attorney was sent regular correspondence detailing the care you were receiving.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain.

(L). Because of your actions in trying to remove the stitches and because you had injured yourself, you were placed on a suicide watch in a restraint chair to keep you from causing further injury to yourself or others.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain.

113. On February 27, 2004, a second order of protection was entered directing you not to attempt to make contact with any of the victims.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

114. Eleven letters were confiscated between April 3, 2004, and July 7, 2004, that you attempted to send in the mail after the February order of protection had been entered.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11 and Defendants' Exhibit 8.

115. The victims complained to the victim-witness coordinator that you had been contacting them through the mail.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

116. Over the duration of your incarceration at the CCDC, you took a variety of medications.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibits 5 and 6.

117. You made frequent requests for medical treatment or for an increase in the medication you were taking.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 4.

118. Each time you complained of a medical need, you were observed and treated as promptly as possible.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibits 4, 5, and 6.

119(A). On December 10, 2004, the victim-witness coordinator requested that the jail staff not allow you to contact the victims through the mail because you were sending mail through a third party.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11 and Exhibit 2B at page 31.

(B). Again on December 21, 2004, A complaint was made that you were getting letters to your children and they were getting upset.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 33.

120(A). On December 14, 2004, you were given a bandage kit containing among other things a tube of triple antibiotic cream, a tube of cortisone cream, and a partial bottle of hibiclens. When Officer Lott picked up the kit he discovered all tubes were gone and the

bottle of hibiclens was empty. Lott discovered you had emptied part of it into the trash bag.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 32.

(B). On December 21st you complained that you had no hibiclens. Lott told you that was because you had wasted it but emptying it into the trash bag.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 34.

121. On December 28, 2004, you were instructed to move from your cell in juvenile block to cell seven in male block. You refused to comply. You had to be told several times and Sheriff Medford had to be summoned before you finally complied.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at

page 19.

122. In March and April of 2005, Shelia Howerton and Dr. Riccardi refused to treat you.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

123(A). The CCDC attempted to make you an appointment with other doctors in the county but all refused.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

(B). Your Mother, Clara Bieleki, also attempted to make you an appointment. However, even Dr. Malone, your family doctor prior to incarceration refused to treat you because you had sent him a letter firing him.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

124. Finally, your Mother was able to make arrangements for you to see her doctor, Dr. Justice in Jasper, Arkansas. Your attorney, Mr. Vowell, obtained a court order to allow the CCDC to take you out of Carroll County to Jasper so that your current medications could be refilled.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 7 at page 11.

125(A). On April 1, 2005, during a shakedown of your cell, a plastic deodorant container was found containing various medication tablets and capsules was found hidden under your mattress.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 38.

(B). The medications were determined to be your prescription medications Tramadol, Seroquel, Carisprodol, Diazepam, and Benadryl.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 38.

(C). Jailers were notified to give you only your prescription medications and no over the counter medications. They were to provide you with water and watch you put the medication in your mouth and swallow the water. Jailers were then to have you show them

your empty mouth.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 39.

126(A). On June 10, 2005, you complained of chest pains radiating from the left side of your chest and back. You were checked by Jailer Smith and Pete Moss. Your blood pressure was taken and it was 132/96. The Emergency Medical Services unit from St. John's hospital was called to come and check you.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 36.

(B). The paramedic ran several tests but did not find anything wrong. You stated you had a bad headache and were feeling nauseous. You were told that you could either sign an against medical advice form or go to the hospital.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 36.

(C). You were transported to the hospital.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 36.

(D). You were later transported back to the jail.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 36.

127(A). On September 21, 2005, you refused to your meal of rice with beef salad, cake, apple sauce, two slices of bread, and milk.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 2B at page 37.

(B). Please explain why you refused to eat your meal.

Answer:

(C). The meals you were served at the CCDC were sufficient to maintain your health.

Agree_____ Disagree_____ Without knowledge to agree or disagree_____.

If you disagree, explain. In explaining, be specific.

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

(D). Do you contend you suffered any physical injury as a result of the meals you were served while detained at the CCDC?

Answer: Yes _____ No _____.

If you answered yes, please describe: (a) the physical injury you suffered; (b) the symptoms you experienced; (c) the severity of those symptoms; (d) whether you sought, or received, medical care as a result of those injuries; and (e) how long it took you to recover from the injuries. Also point out in the medical records any reference to the physical injuries.

128. During your incarceration at the CCDC, you received the following medications

Seroquel, Tizanidine, Clarinex, Diazepam, Lexapro, Oxycodone, Nasacort, Paxil, Tramadol, Clindiamyclia, Klonopin, Butaz, Promethazine, Maxalt, Dicloxacill, Inderal, Levaquin, Cephalexin, Doxycycline, Prilosec, Tenormin, Bextra, Lipitor, Soma, Aspirin, Ultracet, Cephalexin, Corizporin, Carisprodol, Flonase, Tylenol, Bactiracin, Famotidine, Ambien, SB Allergy, Butal, Periogard, Clonazepam, Benadryl, Potass CL, Panlor, Furosemide, Trazodone.

Agree Disagree Without knowledge to agree or disagree .

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 5A to 5E.

[illegible]

129. Each time a medication was prescribed to you by medical personnel, the CCDC

obtained the medication and it was dispensed to you.

Agree _____ Disagree _____ Without knowledge to agree or disagree _____.

If you disagree, explain.

[illegible]

130. By September of 2005, Carroll County had spent approximately \$35,000 on prescriptions and medical treatment for you.

Agree Disagree Without knowledge to agree or disagree .

If you disagree, explain. In explaining, please refer to Defendants' Exhibit 6.

131. You mention being confined to the restraint chair.

(A). With respect to this claim, please state: (a) the name of each defendant who you claim was responsible for confining you to the restraint chair; (b) the date or dates on which you were confined to the restraint chair; (c) the length of time you were confined to the chair on each occasion; (d) whether you were released for short periods to stretch your legs, use the restroom or any other reason during your period of confinement; and (e) the reason you were confined.

(B). Do you contend you suffered physical injury as a result of your confinement to the restraint chair?

Answer: Yes _____ No _____.

If you answered yes, please describe: (a) the physical injury you suffered; (b) the symptoms you experienced; (c) the severity of those symptoms; (d) whether you sought, or received, medical care as a result of those injuries; and (e) how long it took you to recover from the injuries. Also point to any reference in your medical requests, grievances, or medical records to any mention of these physical injuries.

This image shows a blank sheet of white paper with horizontal ruling lines. The lines are evenly spaced and extend across the width of the page. There are no margins, text, or other markings on the paper.

132. With respect to each of the following defendants, state how he or she violated your federal constitutional rights:

(A). Sheriff Medford:

(B). Lt. Beth Reely:

(C). Jimmy Keeland:

(D). Michael Brown:

(E). Pete Moss:

(F): Jack Gentry:

(G): George Jeffries:

(H). Mark Lotta:

(I) Shelia Howerton:

Detail below any further response you would like to make to the motion for summary judgment filed by the Carroll County Defendants. If you have any exhibits you would like the court to consider, you may attach them to this response.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT.

EXECUTED ON THIS _____ DAY OF _____ 2007.

MICHAEL S. GRIFFIS